

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA  
DOCKET NO. 2021-349-E**

In the Matter of:	)	
	)	<b>PETITION TO INTERVENE</b>
Joint Petition of Duke Energy Carolinas, LLC	)	<b>OF THE NORTH</b>
and Duke Energy Progress, LLC to Request	)	<b>CAROLINA SUSTAINABLE</b>
the Commission to Hold a Joint Hearing with	)	<b>ENERGY ASSOCIATION</b>
the North Carolina Utilities Commission to	)	
Develop Carbon Plan	)	

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission (“Commission”), the North Carolina Sustainable Energy Association (“NCSEA”) hereby respectfully petitions to intervene in the above-captioned generic docket. In support of this petition, NCSEA states as follows:

1. NCSEA is a non-profit corporation formed under the laws of North Carolina, with individual, business, and government members located and doing business in both North Carolina and South Carolina. NCSEA’s mission is to promote a sustainable future through the use of renewable energy and energy efficiency programs. NCSEA seeks to achieve its objectives by advocating for public policies that encourage the responsible technological and market development of renewable energy and energy efficiency, including all aspects of demand side management, a smart grid, energy storage, and vehicle electrification.
2. NCSEA’s membership includes businesses that develop renewable energy generation projects in South Carolina, whose businesses will be directly impacted by the Commission’s decision in this proceeding. This Commission has previously approved NCSEA’s participation in Dockets 2019-169-E, 2019-170-E, 2019-182-E, 2020-264-E, 2020-265-E, 2021-143-E, and 2021-144-E.

3. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

4. The name and principal business address of the Petitioner are:

North Carolina Sustainable Energy Association  
4800 Six Forks Road  
Suite 300  
Raleigh, NC 27609

5. Pursuant to Rule R.103-804(5) of the Commission's Rules of Practice and Procedure, NCSEA is represented in this proceeding by counsel who is duly licensed to practice law in the State of South Carolina: and requests that undersigned counsel be added to the official service list:

Jeffrey W. Kuykendall  
Attorney at Law  
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127 King St., Ste. 208  
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Phone: 843.790.5182  
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6. NCSEA consents to service via electronic mail and requests that all communications regarding this docket should be directed to NCSEA's counsel of record, with copies to:

Peter H. Ledford  
General Counsel and Director of Policy  
North Carolina Sustainable Energy Association  
4800 Six Forks Road, Suite 300  
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7. NCSEA has a substantial interest in the subject matter of this proceeding. NCSEA was an active participant in the development of North Carolina Session Law 2021-165, which is the basis for the petition in the above-captioned proceeding.

8. No other party will adequately represent NCSEA's interest in this case.

**WHEREFORE**, for the reasons set forth above, NCSEA respectfully requests that the Commission allow it to intervene in this proceeding and to participate fully as a party in order to protect its unique and substantial interest in this case.

Respectfully submitted,

*/s/ Jeffrey W. Kuykendall* \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 1st day of December, 2021.

/s/ Jeffrey W. Kuykendall \_\_\_\_\_  
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